

C. Brooks Cutter (SBN 121407)
Jennifer S. Domer (SBN 305822)
Celine Cutter (SBN 312622)
CUTTER LAW P.C.
401 Watt Avenue
Sacramento, CA 95864
Telephone: 916-290-9400
Facsimile: 916-588-9330
Email: bcutter@cutterlaw.com
jdomer@cutterlaw.com
ccutter@cutterlaw.com

Attorneys for ROE CL Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: UBER TECHNOLOGIES,
INC., PASSENGER SEXUAL
ASSAULT LITIGATION

| Case No : 3:23-md-03084-CRB

Hon. Charles R. Breyer

**ATTORNEY JENNIFER S.
DOMER'S DECLARATION
REGARDING PLAINTIFFS NOT
IN COMPLIANCE WITH
COURT'S AUGUST 8, 2025
ORDER**

Date: August 22, 2025

Time: 10:00 a.m.

Courtroom: 6 – 17th Floor

This Document Relates to:

Jane Roe CL 16 v. Uber Technologies, Inc., et al., No. 3:24-cv-04837-CRB

Jane Roe CL 24 v. Uber Technologies, Inc., et al., No. 3:24-cv- 05536-CRB

Jane Roe CL 34 v. Uber Technologies, Inc., et al., No. 3:24-cv- 05696-CRB

Jane Roe CL 36 v. Uber Technologies, Inc., et al., No. 3:24-cv- 05720-CRB

Jane Roe CL 37 v. Uber Technologies, Inc., et al., No. 3:24-cv-05728-CRB

Jane Roe CL 38 v. Uber Technologies, Inc., et al., No. 3:24-cv- 05729-CRB

Jane Roe CL 42 v. Uber Technologies, Inc. et al No. 3:24-cv-05740-CRB

Jane Roe CL 43 v. Uber Technologies, Inc. et al No. 3:24-cv-05741-CRB

Jane Roe CL 48 v. Uber Technologies, Inc. et al. No. 3:24-cv-05810-CRB

1 *Jane Roe CL 53 v. Uber Technologies,
2 Inc., et al., No. 3:24-cv- 05831-CRB*

3 *Jane Roe CL 56 v. Uber Technologies,
4 Inc., et al., No. 3:24-cv- 05837-CRB*

5 *Jane Roe CL 65 v. Uber Technologies,
6 Inc., et al., No. 3:24-cv- 06189-CRB*

7 *Jane Roe CL 70 v. Uber Technologies,
8 Inc., et al., No. 3:24-cv- 06863-CRB*

9 *Jane Roe CL 71 v. Uber Technologies,
10 Inc., et al., No. 3:24-cv- 06864-CRB*

11 *Jane Roe CL 76 v. Uber Technologies,
12 Inc., et al., No. 3:24-cv- 07569-CRB*

13 *Jane Roe CL 77 v. Uber Technologies,
14 Inc., et al., No. 3:24-cv- 07571-CRB*

15 *Jane Roe CL 78 v. Uber Technologies,
16 Inc., et al., No. 3:24-cv- 07584-CRB*

17 *Jane Roe CL 79 v. Uber Technologies,
18 Inc., et al., No. 3:24-cv- 07857-CRB*

19 *Jane Roe CL 81 v. Uber Technologies,
20 Inc., et al., No. 3:24-cv- 08521-CRB*

21 *Jane Roe CL 83 v. Uber Technologies,
22 Inc., et al., No. 3:24-cv- 08525-CRB*

23 *Jane Roe CL 84 v. Uber Technologies,
24 Inc., et al., No. 3:24-cv- 08526-CRB*

25 *Jane Roe CL 85 v. Uber Technologies,
26 Inc., et al., No. 3:24-cv- 08754-CRB*

27 *Jane Roe CL 86 v. Uber Technologies,
28 Inc., et al., No. 3:24-cv- 08756-CRB*

29 *Jane Roe CL 88 v. Uber Technologies,
30 Inc., et al., No. 3:24-cv- 09145-CRB*

31 *Jane Roe CL 91 v. Uber Technologies,
32 Inc., et al., No. 3:24-cv- 09235-CRB*

33 *Jane Roe CL 92 v. Uber Technologies,
34 Inc., et al., No. 3:24-cv- 09237-CRB*

35 *Jane Roe CL 93 v. Uber Technologies,
36 Inc., et al., No. 3:24-cv- 09549-CRB*

- 1 *Jane Roe CL 98 v. Uber Technologies,
2 Inc., et al., No. 3:25-cv- 00853-CRB*
- 3 *Jane Roe CL 101 v. Uber Technologies,
4 Inc., et al., No. 3:25-cv- 01118-CRB*
- 5 *Jane Roe CL 102 v. Uber Technologies,
6 Inc., et al., No. 3:25-cv- 01120-CRB*
- 7 *Jane Roe CL 103 v. Uber Technologies,
8 Inc., et al., No. 3:25-cv- 01347-CRB*
- 9 *Jane Roe CL 105 v. Uber Technologies,
10 Inc., et al., No. 3:25-cv- 01349-CRB*
- 11 *Jane Roe CL 107 v. Uber Technologies,
12 Inc., et al., No. 3:25-cv- 01470-CRB*
- 13 *Jane Roe CL 109 v. Uber Technologies,
14 Inc., et al., No. 3:25-cv- 01652-CRB*
- 15 *Jane Roe CL 110 v. Uber Technologies,
16 Inc., et al., No. 3:25-cv- 01653-CRB*
- 17 *Jane Roe CL 114 v. Uber Technologies,
18 Inc., et al., No. 3:25-cv- 01942-CRB*
- 19 *Jane Roe CL 118 v. Uber Technologies,
20 Inc., et al., No. 3:25-cv- 02132-CRB*
- 21 *Jane Roe CL 119 v. Uber Technologies,
22 Inc., et al., No. 3:25-cv- 02133-CRB*
- 23 *Jane Roe CL 122 v. Uber Technologies,
24 Inc., et al., No. 3:25-cv- 02138-CRB*
- 25 *Jane Roe CL 126 v. Uber Technologies,
26 Inc., et al., No. 3:25-cv- 02495-CRB*
- 27 *Jane Roe CL 127 v. Uber Technologies,
28 Inc., et al., No. 3:25-cv- 02496-CRB*
- 29 *Jane Roe CL 130 v. Uber Technologies,
30 Inc., et al., No. 3:25-cv- 02742-CRB*
- 31 *Jane Roe CL 131 v. Uber Technologies,
32 Inc., et al., No. 3:25-cv- 02743-CRB*
- 33 *Jane Roe CL 135 v. Uber Technologies,
34 Inc., et al., No. 3:25-cv- 02747-CRB*
- 35 *Jane Roe CL 137 v. Uber Technologies,
36 Inc., et al., No. 3:25-cv- 03036-CRB*

1 *Jane Roe CL 138 v. Uber Technologies,*
2 *Inc., et al., No. 3:25-cv- 03137-CRB*

3 *Jane Roe CL 139 v. Uber Technologies,*
4 *Inc., et al., No. 3:25-cv- 03255-CRB*

5 *Jane Roe CL 142 v. Uber Technologies,*
6 *Inc., et al., No. 3:25-cv- 03258-CRB*

I, Jennifer S. Domer, declare as follows:

1 1. I am an attorney at Cutter Law P.C. admitted to practice before the
2 courts of the State of California. I am a Partner at Cutter Law, P.C., and am one of
3 the counsels of record for all filed Jane Roe CL claimants. I have personal
4 knowledge of the matters set forth herein, and if called to testify, I would testify
5 competently as to the information below.

6 2. This declaration is made pursuant to the Court's Order to submit a
7 Declaration within 28 days day of the Order (September 5, 2025 being 28 days
8 from August 8, 2025, the date the Order was signed) as to whether Counsel
9 disagrees with any Plaintiff inclusion in Uber's Declaration, which Defendants
10 submitted on August 25, 2025.

11 3. Counsel's firm has made extensive efforts to reach clients listed as
12 Exhibit A, subject to Defendants' Motion to Dismiss.

13 4. Counsel submitted a response to the Opposition Motion on July 30,
14 2025, and explained we would continue to make efforts to reach any missing
15 claimants.

16 5. Those efforts include extensive phone calls, text messages, emails,
17 physical mailings to last known address, and additional address searches in
18 databases. Counsel has also employed a private investigator to help locate these
19 individuals. Through the database searches and private investigators, Counsel also
20 attempted to reach potential relatives in an effort to reach the Plaintiffs.

21 6. Through those continued efforts, Counsel received two PFSs after the
22 date that Defendants submitted their Declaration.

1 7. Counsel submitted PFSs for Jane Roe CL 56 and Jane Roe CL 137 on
2 September 5, 2025.

3 8. Though late, the submission of their PFSs is still prior to the Court
4 entering an Order for Dismissal.

5 9. Counsel would therefore dispute their inclusion on Uber's current list
6 of delinquent PFSs for their Motion, as well as ask for their exclusion on the
7 Court's future entry of Dismissal.

8 I declare under penalty of perjury that the foregoing is true and correct, and
9 that this declaration was executed on September 5, 2025, in Sacramento,
10 California.

12 Dated: September 5, 2025

CUTTER LAW P.C.

14 By: /s/ Jennifer S. Domer

15 Jennifer S. Domer

16 *Attorney for Jane Roe CL Plaintiffs*